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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
LEED ENVIRONMENTAL, INC.**

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January 10, 2000

Telecopy and First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Voluntary Progress Report 8 (December 1999)**

Dear Mr. Bradley:

As requested by the U.S. Environmental Protection Agency ("EPA"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") on a voluntary basis to provide EPA with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, and the remedial design for groundwater that were performed in regard to the NL Industries/Taracorp Superfund Site (the "site") during December 1999.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- During December 1999, the Group's supervising contractor, ENTACT, Inc. ("ENTACT"), continued to perform remedial activities related to remediation of residential lots and remote fill areas. Major tasks performed by ENTACT included soil sampling and analysis activities and remediation of 29 residential lots and 4 remote fill lots. The residential lots and remote fill lots which were remediated in December 1999 are summarized on Table 1 and Table 2, respectively. Through December 1999, ENTACT has completed remedial activities at 759 residential properties and 30 remote fill properties. ENTACT also completed remediation of the Glen Carbon alley area.
- During December 1999, ENTACT also continued with efforts related to remediation of the Taracorp pile. Major tasks performed by ENTACT included: (1) placement of gravel backfill; (2) installation of a concrete entrance into the State Street Warehouse property; (3) reinstallation of security fence; (4) miscellaneous site restoration activities; (5) site surveying; and (6) related activities.



- During December 1999, ARCADIS Geraghty & Miller ("ARCADIS") personnel and representatives of the Group continued project planning efforts, including efforts to secure access to off-site properties, associated with the implementation of the pre-design investigation for groundwater.
- On December 3, 1999, ENTACT issued a report to project participants to document the results of the weekly progress meeting held on November 29, 1999.
- On December 6, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, the Army Corps of Engineers ("ACOE"), ENTACT, and the Group's Technical Committee. ENTACT issued a report to project participants on December 14, 1999 to document the results of the meeting.
- On December 10, 1999, the Group's project coordinator issued a voluntary progress report to EPA.
- On December 15, 1999, a meeting was held at the site to discuss the status of the residential and remote fill lot cleanup and remaining remedial action tasks to be performed at the main industrial facility and off-site areas. Site inspections were performed at the main industrial facility and Slough Road. Participants in the meeting and site inspections included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee.
- On December 17, 1999, ARCADIS personnel issued access agreements to nine property owners as part of efforts to secure access for installation of groundwater monitoring wells and groundwater sampling. The status of the Group's efforts to secure access for the predesign investigation for groundwater is summarized on Table 3.
- On December 20, 1999, a weekly progress meeting was held to discuss the status of the remediation of residential lots, remote fill areas, and the Taracorp pile. Attendees at the meeting included representatives of EPA, ACOE, ENTACT, and the Group's Technical Committee.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Data from soil sampling activities performed by ENTACT during December 1999 in residential lots and remote fill areas have previously been provided by ENTACT personnel to EPA and have been used as the basis for defining soil excavation depths.

- Data collected from monitoring performed at the industrial site are maintained by ENTACT personnel and are available for inspection by EPA and ACOE personnel at the site.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- Not applicable for this reporting period.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- ARCADIS personnel will continue to prepare for field activities associated with the pre-design investigation for groundwater and will continue efforts to address EPA's comments on the Pre-Design Investigation Work Plan for Groundwater. The Group will continue efforts to secure access to appropriate properties for installation of monitoring wells. As soon as a sufficient number of access agreements have been executed by property owners, the Group will advise EPA with a schedule for initiation of the pre-design investigation for groundwater.
- During January 2000, ENTACT will continue miscellaneous restoration activities associated with residential lots and remote fill lots. Excavation of soil and restoration activities at the remaining seven residential lots and one remote fill lot will be performed as soon as sod availability and weather allows. ENTACT and the Group will continue efforts to resolve issues with EPA related to the scope of work at Slough Road.
- During January 2000, ENTACT will also continue miscellaneous restoration activities associated with remediation of the Taracorp pile.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As noted above, the Group and ENTACT personnel will continue efforts to resolve issues related to the scope of work at Slough Road. Also, ENTACT will complete excavation and site restoration activities at the remaining residential and remote fill lots as soon as weather conditions allow.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

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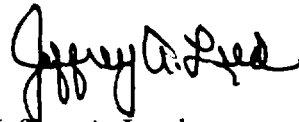
7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

- Not applicable for this reporting period. Unless requested by EPA, no community relations activities are currently planned to be performed by the Group during the next six-week period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

attachments

cc: Mr. Bob Rogers, Illinois EPA (w/attachment, by first class mail)
Mr. Tim Healy - ENTACT, Inc. (w/attachment, by first class mail)
Mr. Nicholas Valkenburg - ARCADIS Geraghty & Miller (w/attachment, by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(w/attachment, by first class mail)

TABLE 1
RESIDENTIAL LOTS

Weekly Progress Report - Activities Through 12/15/99

	Lot #	Street	Depth	Backfill Crew	Soil Removal	Backfill	Stone
731	1607	Elizabeth	3		12/1/1999	12/1/1999	12/1/1999
732	1940	State	12		12/1/1999	12/1/1999	12/1/1999
733	1928	State	12		12/1/1999	12/1/1999	12/1/1999
734	2145	State	3		12/2/1999	12/2/1999	12/2/1999
736	1728	Edwardsville	6	2 lots	12/2/1999	12/3/1999	12/3/1999
737	2103	Monroe	6		12/6/1999	12/7/1999	12/7/1999
739	2108	Nevada	3	2 lots	12/6/1999	12/6/1999	12/6/1999
740	2032	Washington	12		12/6/1999	12/7/1999	12/7/1999
741	525	Meredocia	6		12/7/1999	12/8/1999	12/8/1999
742	1818	State	6		12/9/1999	12/16/1999	12/16/1999
743	1840	State	12		12/9/1999	12/16/1999	12/16/1999
744	1437	Grand	12		12/10/1999	12/11/1999	12/11/1999
746	1707-11	Delmar	12	2 lots	12/11/1999	front 12/14	
748	814	Madison	12	2 lots	12/13/1999	12/20/1999	12/20/1999
750	1460	State	12	2 lots	12/13/1999	N/A	st 12/15
751	2438	Grand	3		12/14/1999	12/14/1999	12/14/1999
753	1436	State	6	2 lots	12/14/1999	N/A	12/17/1999
754	1441	Madison	12		12/15/1999	12/15/1999	12/15/1999

TABLE 1 (continued)
RESIDENTIAL LOTS

Weekly Progress Report - Activities Through 12/31/99

	Lot #	Street	Depth	Notes	Soil Removal	Backfill	Stone
731	1607	Elizabeth	3		12/1/99	12/1/99	12/1/99
732	1940	State	12		12/1/99	12/1/99	12/1/99
733	1928	State	12		12/1/99	12/1/99	12/1/99
734	2145	State	3		12/2/99	12/2/99	12/2/99
736	1728	Edwardsville	6	2 lots	12/2/99	12/3/99	12/3/99
737	2103	Monroe	6		12/6/99	12/7/99	12/7/99
739	2108	Nevada	3	2 lots	12/6/99	12/6/99	12/6/99
740	2032	Washington	12		12/6/99	12/7/99	12/7/99
741	525	Meradocia	6		12/7/99	12/8/99	12/8/99
742	1818	State	6		12/9/99	12/16/99	12/16/99
743	1840	State	12		12/9/99	12/16/99	12/16/99
744	1437	Grand	12		12/10/99	12/11/99	12/11/99
748	1707-11	Delmar	12	2 lots	12/11/99	12/22/99	12/22/99
748	814	Madison	12	2 lots	12/13/99	12/20/99	12/20/99
750	1460	State	12	2 lots	12/13/99	N/A	12/27/99
751	2438	Grand	3		12/14/99	12/14/99	12/14/99
753	1436	State	6	2 lots	12/14/99	N/A	12/17/99
754	1441	Madison	12		12/15/99	12/15/99	12/15/99
755	2620	Denver	12		12/16/99	12/20/99	12/20/99
757	1430	State	12	2 lots	12/21/99	N/A	12/22/99
759	1420	State	3	2 lots	12/22/99	N/A	12/23/99

TABLE 2
REMOTE FILL LOTS

Progress Report - Activities Through 12/15/99

Lot #	Street	Soil Removal	Backfill	Stone
27	91 Harrison	12/10/1999		N/A

Progress Report - Activities Through 12/31/99

	Lot #	Street	Notes	Soil Removal	Backfill	Stone	Seed
28		729 Broadway		12/16/99	N/A	12/16/99	N/A
29		205 Weber		12/23/99	12/23/99	12/23/99	12/30/99
30		1229 Robin		12/28/99	12/28/99	12/28/99	12/30/99
	91	Harrison	Eagle Park Sign	12/10/99	12/28/99	N/A	12/29/99
	#7	Guy Street	Glen Carbon	12/15/99	12/21/99	N/A	12/28/99

TABLE 3
NL INDUSTRIES/TARACORP SUPERFUND SITE
STATUS OF ACCESS TO PROPERTIES FOR PREDESIGN INVESTIGATION FOR GROUNDWATER

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 101		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 102		✓	Off-site (east of main industrial)		Aetna Freight Lines Inc. 1501 Grand Granite City, IL 62040		Property owner recently identified. Access agreement to be prepared.
MW 103		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 103-91		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 104		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 104-92		✓	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
MW 105D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

January 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 105S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 106 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 D		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 107 S		✓	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 108 D		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

January 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 108 S		✓ (not located during site visit)	Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		
MW 109-92		✓ (not located during site visit)	Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		
MW 110		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 111-92		✓ (not located during site visit)	Off-site (northeast of main industrial)		Not known		
MW 108 X	✓		Main industrial		Metalico Mr. George E. Webb, Jr. 1200 16th Street Granite City, IL 62040		Access agreements signed by Taracorp Industries, Inc. on 3/31/99 and by Metalico-Granite City, Inc. on 4/1/99.
MW 109 X	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

January 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
MW 112	✓		Main industrial		Mr. Scott Oney State Street Warehouse & Transfer 1459 State Street Granite City, IL 62040		Access agreement signed 4/12/99.
GMMW-113	✓		Main industrial (opposite side of State Street from State Street Warehouse)	22-2-19-24-15-401-006 22-2-19-24-15-401-007	John G. Obucina 1460 State Street Granite City, IL 62040	John G. Obucina 15th & State Streets Granite City, IL 62040	Access agreement issued on 12/17/99.
GMMW-114	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-115	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-116	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access to be incorporated into access agreement sent to National Steel Corp. on 12/17/99.
GMMW-117	✓		Venice Township	21-1-19-25-00-000-009	Bissell Street Warehouse Co. 1226 Bissell Avenue Venice, IL 62090	Bissell Street Warehouse Co. Highway 3/P.O. Box C Madison, IL 62060	Access agreement issued on 12/17/99.
GMMW-118	✓		Venice Township	21-2-19-35-15-401-906.000	Gulf Mobile Ohio RR Kerr Street Venice, IL 62090	Illinois Cental RR 455 North Cityfront Plaza Dr. Chicago, IL 60611	Access agreement issued on 12/17/99.
GMMW-119	✓		Venice Township	21-2-19-35-00-000-011.T00 21-2-19-35-00-000-012.T00	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Madison IL & St. Louis Ry Co. 4th Street Venice, IL 62090	Access agreement issued on 12/17/99.
GMMW-120	✓		Eagle Park Acres	21-1-19-36-08-201-004	Eagle Park Acres Imp. Assn Hill Street Madison, IL 62060	Eagle Park Acres Imp. Assn. P.O. Box 385 Madison, IL 62060	Access agreement issued on 12/17/99.

Table 3 (continued)

Status of Access to Properties for Predesign Investigation for Groundwater

January 10, 2000

Monitoring Well ID	Well Status		Area	Tax ID #	Site Address	Tax Payer Address	Access Status
	Proposed	Existing					
GMMW-121	✓		Eagle Park Acres	21-2-19-36-16-401-036	Bobby L. & Verlillian Ervin 214 Watson Street Madison, IL 62060	Bobby L. & Verlillian Ervin 212 Watson Street Madison, IL 62060	Access agreement issued on 12/17/99.
				Venice Township	Northern parkway of Mary Street, south of Watson Street		
GMMW-122	✓		Eagle Park Acres	21-2-19-36-12-202-008	Willie R. Foster Earle Street Madison, IL 62060	Willie R. Foster 306 Terry Street Madison, IL 62060	Access agreement issued on 12/17/99.
				Venice Township	Northwest side of Earle Street, south of Allen Street		
GMMW-123	✓		Main industrial	21-2-19-25-07-201-014	Martin and Baily, Inc. Madison Avenue Madison, IL 26060	Martin and Bailey, Inc. P.O. Box 385 Carmi, IL 62821	Access agreement issued on 12/17/99.
				Venice Township	Northside of 12th Street between Madison and Iowa Streets and alley between Madison and Iowa Streets, north of 12th Street, 200 feet		
GMMW-124 GMMW-125	✓		Main industrial	21-1-19-24-18-301-002	National Steel Corp. Granite City Steel Co. Div. 1417 State Street Granite City, IL 62040	National Steel Corp. Granite City Steel Co. Division 20th & State Street Granite City, IL 62040	Access agreement issued on 12/17/99.